

**UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND**

**DEBORAH LAUFER,  
Plaintiff,**

v.

**Case No: 8:20-cv-1974**

**FT. MEADE HOSPITALITY, LLC,  
Defendant.**

**PLAINTIFF'S MOTION FOR LEAVE TO FILE AMENDED COMPLAINT**

Plaintiff, by and through undersigned counsel, hereby moves this Court For Leave To File an Amended Complaint, attached hereto as Exhibit A.

1. This Court denied Plaintiff's Motion for Default Judgment without prejudice due to alleged deficiencies in the Complaint. Plaintiff's complaint was premised on the literal language of the governing sections of the Americans With Disabilities Act and Regulation promulgated thereunder, which requires the defendant to provide certain information to disabled persons on its online reservations system.
2. Plaintiff therefore requests leave to file the attached amended complaint, redlined for comparison, which more fully describes her plans to travel to the area and addresses the issues raised by the Defendant and this Court.

**Memorandum**

Fed. R. Civ. P. 15(a)(2) provides that a party may amend their pleading with leave of court and that leave should be freely given when justice so requires. While Plaintiff disagrees with this Court's ruling that the allegations of the complaint fail to set forth a cause of action, Plaintiff submits that the proposed amendment would address the Court's concerns.

Respectfully submitted,

/s/ Tristan W. Gillespie  
Tristan W. Gillespie, Esq.

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CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of December, 2020, a copy of the foregoing Memorandum in Opposition to the Motion to Dismiss was filed electronically and served on all counsel of record via the Court's CM/ECF system.

/s/ Tristan W. Gillespie